

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America
v.

Gildardo MEJIA-GUZMAN

Case No. 2:21-mj-297

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/07/2019 in the county of Madison in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

21 USC Section 846

Conspiracy to possess with intent to distribute over 5 kilograms of a mixture
or substance containing a detectable amount of heroin

This criminal complaint is based on these facts:

See attached affidavit, which is incorporated by reference.

☒ Continued on the attached sheet.

Lance Jardot
Complainant's signature

Lance Jardot, SA
Printed name and title

Sworn to before me and signed in my presence.

Date: 04/27/2021

City and state: Columbus, Ohio

Kimberly A. Tolson
United States Magistrate Judge



AFFIDAFIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Lance Jardot, (hereafter referred to as affiant), being duly sworn, depose and state as follows:

INTRODUCTION

Your affiant has been a Special Agent of the Drug Enforcement Administration (DEA) since February 2017, currently assigned to the Detroit Field Division, Columbus District Office. As such, your affiant is an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct criminal investigations and make arrests for offenses enumerated in 18 U.S.C. § 2516. Your affiant is empowered to investigate, to make arrests with or without warrants and to execute search warrants under the authority of 21 U.S.C. § 878.

Your affiant holds a Bachelor’s Degree in Interdisciplinary Studies (Criminal Justice & Natural Sciences).

Prior to being employed by the DEA, your affiant was employed as a Special Agent for the Oklahoma Bureau of Narcotics (OBN). Your affiant has accumulated the following training and experience:

- (a) Your affiant has completed the DEA Basic Agent Training Academy; the Oklahoma Council on Law Enforcement Education and Training Basic Police Training Academy; and the Oklahoma Bureau of Narcotics – Basic Narcotics Investigator’s Course.
- (b) Your affiant’s specialized narcotics-related training includes drug identification, interview and interrogation, managing informants, undercover operations, conspiracy investigations, surveillance and electronic monitoring techniques, tactical application of narcotics enforcement, search and seizure law, pharmaceutical diversion, clandestine drug labs, marijuana cultivation and money laundering investigations. Your affiant receives training on a daily basis by conducting criminal narcotic investigations and drawing on the expertise of agents more experienced than your affiant.
- (c) As a DEA Special Agent, your affiant’s experience includes conducting and/or participating in the following: criminal arrests, interviewing drug users and drug distributors, undercover drug buys involving both confidential sources and undercover law enforcement agents, conducting surveillance, trash seizures, and executing search and seizure warrants.

The information set forth in this affidavit comes from your affiant’s personal involvement in this investigation, as well as information provided to your affiant by other law enforcement officers. This affidavit is intended to show only that there is sufficient probable cause for the requested criminal complaint and does not set forth all of my knowledge about this investigation.

PROBABLE CAUSE

In approximately September of 2019, members of the Drug Enforcement Administration (DEA) began an investigation into a Mexican based drug trafficking organization (DTO) that provided 6 bricks of heroin, approximately 6.8 gross kilograms, to a DEA undercover (UC) agent for transportation to the Columbus, Ohio area for distribution.

On October 7, 2019, a DEA UC investigator exchanged a series of telephone calls with an unknown male to arrange for the sale of 6 kilograms of heroin. The UC agreed to do the exchange at the TA Travel Center located at 940 US-42, London, Ohio, located in the Southern District of Ohio.

On the same date, at approximately 12:50 p.m., investigators observed a silver Dodge Dart bearing Ohio license plate HTG5150 arrive at the TA Travel Center, driven by Gildardo MEJIA-GUZMAN. MEJIA-GUZMAN met with a DEA UC investigator and exchanged approximately \$52,000 in U.S. currency for 6 kilograms of “sham” heroin, fake drugs that were made to appear like real drugs. MEJIA-GUZMAN then returned to the Dodge Dart with the “sham” heroin and departed the area.

At approximately 1:06 p.m., while traveling eastbound on I-70 towards Columbus, MEJIA-GUZMAN was stopped by Troopers with the Ohio State Highway Patrol near mile marker 90 in Madison County, Ohio. A probable cause search of the vehicle revealed a glass jar containing marijuana, and a backpack that contained the 6 kilograms of “sham” heroin. Because no Spanish speaking law enforcement agents were present, MEJIA-GUZMAN was transported to the DEA Columbus District Office to be interviewed with the assistance of a Spanish speaking investigator.

Prior to the interview, a Spanish speaking DEA Agent read MEJIA-GUZMAN his Miranda Warning in Spanish, and MEJIA-GUZMAN agreed to speak with investigators. MEJIA-GUZMAN admitted that he was instructed to meet someone and pick up drugs from them at a truck stop, and that he subsequently did that.

Based upon the above information, your affiant submits there is probable cause to believe that Gildardo MEJIA-GUZMAN conspired to possess with the intent to distribute over 5 kilograms of a mixture or substance containing a detectable amount of heroin, in violation of 21 U.S.C. § 846.

Lance Jardot
Lance Jardot
Special Agent
Drug Enforcement Administration

Subscribed and sworn before me this 27th day of April, 2021.

Kimberly A. Tolson
Kimberly A. Tolson
United States Magistrate Judge

